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Admitted in NY & N.I.

February 22, 2023

## VIA ECF

Hon. Judge William F. Kuntz, II Eastern District of New York 225 Cadman Plaza East Brooklyn, NY 11201

Re:

Green Mountain Holdings (Cayman) Ltd. v. Precision Pro Contracting Services,

**LLC** 

Docket No.: 1:21-cv-03287-WFK-VMS

## Dear Judge Kuntz:

My office is incoming substituted counsel for Green Mountain Holdings (Cayman) Ltd. In connection with Magistrate Judge Scanlon's Order dated January 20, 2023, the Parties submit this joint letter concerning anticipated dispositive motion practice pursuant to Rule 56 of the Federal Rules of Civil Procedure. Specifically, the Parties have met and conferred and request that the Court permit the Parties to file pre-motion conference request letters on or before March 31, 2023 pursuant to Rule III.B of Your Honor's Individual Rules. At this time, Plaintiff and Third-Party Defendant anticipate filing pre-motion conference request letters seeking leave to move for summary judgment.

Further, the parties apologize for the delay in filing this joint letter. The undersigned was recently retained and it has taken some extended time for the Parties to complete their meet and confer over these issues. Should you have any questions, feel free to contact us.

## Respectfully submitted,

/s/Danielle P. Light
Danielle P. Light, Esq.
Counsel for Plaintiff
Green Mountain (Cayman) Ltd

/s/ Daniel H. Richland
Daniel H. Richland, Esq.
Counsel for Defendant Precision
Pro Contracting Services, LLC

/s/ Stephen J. Steinlight
Stephen J. Steinlight, Esq.
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